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Attorneys for Plaintiff and Cross-Defendant
CHURCH OF SCIENTOLOGY OF CALIFORNIA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF CALIFORNIA, a California Corporation,)	Case No. C 420153
)	(Severed Action)
Plaintiff,)	
v.)	INTERROGATORIES TO
GERALD ARMSTRONG, et al.,)	CROSS-COMPLAINANT
Defendants.)	PROPOUNDED BY
)	CROSS-DEFENDANT,
)	CHURCH OF SCIENTOLOGY
)	OF CALIFORNIA

AND RELATED CROSS-ACTION.)	

TO GERALD ARMSTRONG AND TO HIS ATTORNEYS OF RECORD:

I. INSTRUCTIONS

1. The discovery requested herein, unless otherwise specified (as, for example, by use of the word "ever" or the phrase "at any time") and without regard to the tenses used in any interrogatory or request, requests information for the period from June 1, 1969 to the present. To the extent that any answer varies with respect to any part of that period, a separate answer is requested for each such part, with the pertinent dates indicated.
2. Estimated data should be given when exact data cannot

1 be supplied. Any such estimated data should be designated as
2 such and the basis, source or sources, and/or derivation of
3 each estimate should be separately set forth.

4 3. With respect to the answer to each interrogatory, or
5 subpart thereof, state the source of the information given
6 therein with as much particularity as is reasonably possible,
7 including without limitation the nature and designation of any
8 files that contain such information and the identification of
9 each person who provided any information included in such
10 answer. In addition, identify each other person who respondent
11 knows or believes has or may have some or all of the
12 information sought in such interrogatory or subpart thereof.

13 4. Information sought by any interrogatory may be
14 furnished by reference to the answer furnished to another
15 interrogatory. However, separate answers should be given in
16 all cases, and interrogatories should not be joined together
17 and accorded a common answer.

18 5. These interrogatories require supplemental or amended
19 answers to the extent permitted by California Rules of
20 Procedure and applicable case authorities. See, Rangel v.
21 Graybar Electric Co., 70 Cal.App.3d 943, 139 Cal.Rptr. 191
22 (1977). In addition, these interrogatories shall be deemed to
23 be continuing requests for supplemental answers pursuant to the
24 aforesaid rules and authorities.

25 II. DEFINITIONS

26 1. "Cross-complainant" means the cross-complainant
27 Gerald Armstrong and any agent, representative, attorney or
28 other person acting for or in his behalf.

1 2. "You", "your" and "yourself" means the party to
2 whom these interrogatories are directed, the person answering
3 these interrogatories on his or her behalf, and any present or
4 former officer, employee, agent, servant, representative,
5 attorney, or other person acting for or on behalf of said party.

6 3. "Amended Complaint" means the Third Amended Complaint
7 filed by the cross-complainant on or about July 1, 1983.

8 4. "Person" means any natural person, corporation,
9 association, firm, partnership, or other business or legal
10 entity, and officers, employees, agents, servants or
11 representatives of such entities, as the context requires.

12 5. "Identify" or "Identification", when used in
13 reference to a natural person, means to provide his or her:

14 (a) full name;

15 (b) sex;

16 (c) present or last known residential address;

17 (d) present or last known business address;

18 (e) position, business affiliation and job description at
19 the time in question, with respect to the interrogatory
20 involved; and

21 (f) if applicable, "business" name or d/b/a and the
22 geographic area in which he or she does business under
23 that name.

24 7. "Identify" or "Identification", when used in
25 reference to a document, means to:

26 (a) state the date indicated on the document as being the
27 date thereof, the date of preparation, author or
28 originator and/or addressee where applicable, title (if

- 1 any), subject matter, number of pages, and type of
- 2 document (e.g., contract, letter, report, etc.) or
- 3 some other means of distinguishing the document;
- 4 (b) state a short summary of the contents of the document;
- 5 (c) identify each and every person who prepared or
- 6 participated in the preparation of the document;
- 7 (d) identify each and every person to whom the document
- 8 was distributed or shown;
- 9 (e) state the present location of the document;
- 10 (f) identify each and every person having custody or
- 11 control of the document;
- 12 (g) state whether any copy of the document is not
- 13 identical to the original by reason of shorthand or
- 14 other written notes, initials, or any other
- 15 modifications;
- 16 (h) state, if the document has been destroyed, the date of,
- 17 the circumstances surrounding, and the reason for the
- 18 destruction; and
- 19 (i) identify, if the document has been destroyed, each and
- 20 every person who destroyed, or participated in, or
- 21 ordered or suggested the destruction of the document.

22 10. "Identify" or "Identification", when used in
23 reference to an Agreement, means to:

- 24 (a) state the substance and subject matter of the
- 25 Agreement;
- 26 (b) identify each and every person who is a party to the
- 27 Agreement;

28

- 1 (c) state whether the Agreement was written or oral or
- 2 partly written and partly oral;
- 3 (d) if written, identify each and every document which
- 4 constitutes, reflects, refers to or relates to all or a
- 5 part of the Agreement;
- 6 (e) if oral, identify each and every oral communication,
- 7 which constitutes, reflects, refers to or relates to
- 8 all or part of the Agreement;
- 9 (f) if partly written and partly oral, identify each and
- 10 every document which constitutes, reflects, refers to
- 11 or relates to the written portion and each and every
- 12 oral communication which constitutes, reflects, refers
- 13 to or relates to the oral portion;
- 14 (g) state the date(s) and place(s) when the Agreement was
- 15 entered into; and
- 16 (h) state whether the Agreement has expired, has been
- 17 terminated, or is presently in effect, and if expired
- 18 or terminated, the date of expiration or termination.

19 11. "Identify" or "Identification", when used in
20 reference to an act, means to:

- 21 (a) state the date, place, and duration of the act;
- 22 (b) identify each and every person who participated in the
- 23 act, was present when the act occurred or observed the
- 24 act;
- 25 (c) specify in detail what the act consisted of; and
- 26 (d) if the act consisted, either in whole or in part, of a
- 27 meeting or of an oral communication other than a
- 28 meeting, identify each such meeting or oral

1 communication other than a meeting in the manner
2 specified in paragraph 18 or 19.

3 12. When an Interrogatory calls upon you to "state the
4 basis of" a particular claim, assertion, statement or
5 allegation, you are requested to:

6 (a) identify each and every document, agreement, meeting
7 and other oral communication;

8 (b) identify each and every person who has knowledge or
9 information;

10 (c) identify separately the acts, practices and/or
11 omissions to act on the part of any person (including
12 corporations); and

13 (d) state separately any other fact which forms any part
14 of the source of your information regarding that claim,
15 assertion, statement or allegation.

16 13. "Communication" means any written or oral
17 transmission of fact, information or opinion, including any
18 utterance, notation or statement of any nature whatsoever and
19 including but not limited to documents, correspondence,
20 reports, agreements, meetings, and other oral communications,
21 as defined immediately below.

22 14. "Document" means the original (or, if the
23 information called for cannot be provided or referred to as
24 to the original then each and every non-identical copy thereof)
25 of any writing, graphic matter or other medium upon which
26 intelligence or information can be recorded or retrieved, of
27 correspondence (as defined immediately below), notes,
28 inter-office and intra-office communications, circulars,

1 announcements, directories, declarations, filings, memoranda,
2 agreements, contracts, legal instruments, reports, studies,
3 work papers, records, instructions, notes, notebooks,
4 scrapbooks, diaries, minutes, minutes of meetings, calendars,
5 schedules, projections, plans, drawings, specifications,
6 designs, sketches, projections, photographs, photocopies,
7 charts, graphs, curves, descriptions, accounts, journals,
8 ledgers, bills, invoices, checks, receipts and the like, motion
9 pictures, recordings, published or unpublished speeches or
10 articles, publications, transcripts of telephone conversations,
11 sound recordings, and any other retrievable data (whether
12 encarded, taped, punched or coded, electrostatically,
13 electromagnetically, on computer or otherwise), in the
14 possession, custody or control of cross-complainant or known to
15 cross-complainant wherever located, however produced or
16 reproduced, including any non-identical copy (whether different
17 from the original because of any alterations, notes, comments,
18 initials, underscoring, indication or routing or other material
19 contained thereon or attached thereto, or otherwise), and
20 whether a draft or a final version.

21 15. "Correspondence" means any letter, telegram, telex,
22 TWX, notice, message, memorandum or other written communication
23 or transcription or notes of a communication.

24 16. "Report" means any study, analysis, appraisal,
25 survey, poll, memorandum, statistical and financial
26 compilation, review, forecast, or other type of written or
27 printed compilation of information whether submitted to anyone
28 or not.

1 17. "Agreement" means any express or implied, written
2 or oral, formal or informal contract, agreement, arrangement or
3 understanding of any kind, including any schedule, addendum,
4 exhibit or amendment incorporated therein by reference, and any
5 amendment thereto or modification thereof.

6 18. "Meeting" means any gathering or encounter of two
7 or more natural persons, formal or informal, by agreement or by
8 chance.

9 19. "Other Oral Communication" means any utterance made
10 by any natural person and heard by any other natural person, by
11 whatever method or means made or heard, other than a
12 face-to-face communication at a meeting.

13 20. "Relating to" and "relating thereto" mean refer
14 to, and include relating to, referring to, reporting,
15 embodying, establishing, evidencing, comprising, connected
16 with, commenting on, responding to, showing, describing,
17 analyzing, reflecting, presenting or constituting.

18 21. "Date" means the exact day, month and year if
19 ascertainable, or, if not, the best approximation (including
20 relationship to other events).

21 22. The word "and" and the word "or" shall, where the
22 context permits, be construed to mean "and/or".

23 23. Words used in the singular shall, where the context
24 permits, be deemed to include the plural, and words used in the
25 plural shall, where the context permits, be deemed to include
26 the singular.

1 II. INTERROGATORIES

2 1. Identify, by specifying the full true names and current
3 addresses, each individual person denominated in your Third
4 Amended Complaint as "Does 1 through 100" whose identity and
5 capacity you now know, stating as to each such person:

- 6 a) the precise factual basis for your belief that he or
7 she has committed tortious action(s) against you;
8 b) a full and complete description of each and every
9 document upon which you intend to rely to prove the
10 alleged tortious conduct against you by each such
11 person;
12 c) the full names and current addresses of each and every
13 witness who has knowledge of the alleged tortious
14 conduct against you by each individual Doe identified
15 in your Answer to this interrogatory; and
16 d) the circumstances or information which contributed to
17 your ability to now identify said individuals and the
18 date upon which you first became aware of said
19 circumstances and/or information.

20 2. As to each and every publication identified in
21 Paragraph 10 of your Third Amended Complaint, state:

- 22 a) the date or dates when you read and/or reread each
23 pamphlet, book or booklet;
24 b) the reason and purpose for your reading of each
25 pamphlet, book or booklet;
26 c) the full name and current address of each person who
27 has direct and personal knowledge of your reading each
28 pamphlet, book or booklet;

1 d) the amount paid by you for each such book,
2 booklet or pamphlet.

3 3. For each instance in which you claim your personal
4 disclosures made during "auditing" sessions were later
5 disclosed to third persons, as is alleged in Paragraphs 19(c)
6 and 24 of your Third Amended Complaint, please describe in
7 complete detail the circumstances of the disclosure(s) to third
8 persons, including, but not limited to, the date(s) and
9 place(s), the identity of each and every person involved in
10 and/or witnessing the disclosure(s), the basis of your knowledge
11 about the disclosure(s), the specific content of each and every
12 disclosure made, and how each such disclosure was
13 subsequently used to "control and manipulate" you.

14 4. As to each instance of physical damage you allege to
15 have suffered as a direct or indirect consequence of the act(s)
16 of the Cross-Defendant,

- 17 a) identify with specificity the precise nature of the
18 damage including the date(s) and duration of the
19 damage(s) so identified;
- 20 b) identify the full name and current address of each and
21 every person including, but not limited to, doctor(s),
22 nurse(s), or other health care professional(s), who
23 has knowledge of each instance of physical damage;
- 24 c) identify each and every document which you intend to
25 rely upon to prove each such instance of physical
26 damage.

27 5. As to each instance of emotional, mental and/or
28 psychological damage you allege to have suffered as a direct or

1 indirect consequence of the act(s) of the Cross-Defendant,

- 2 a) identify with specificity the precise nature of the
3 damage including the date(s) and duration of the
4 damage(s) so identified;
- 5 b) identify the full name and current address of each and
6 every person including, but not limited to, doctor(s),
7 nurse(s), or other health care professional(s), who
8 has knowledge of each instance of emotional, mental
9 and/or psychological damage; and
- 10 c) identify each and every document which you intend to
11 rely upon to prove each such instance of emotional,
12 mental and/or psychological damage.

13 6. As to each instance in which you allege materials were
14 "stolen from you by . . . defendants" as is specified in
15 Paragraph 26 of your Third Amended Complaint,

- 16 a) identify with specificity what materials you allege
17 were stolen, providing as to each such item stolen the
18 date and place that the thefts occurred;
- 19 b) identify the full name and present address of each
20 person whom you claim has any knowledge of the theft(s)
21 stating as to each such person the basis of his/her
22 knowledge;
- 23 c) identify each and every document, including, but not
24 limited to police reports and/or insurance claim forms,
25 if any, which in any way would tend to support your
26 allegations of stolen materials.

27 7. As to each instance in you were harassed, as is
28 alleged in Paragraph 26 of your Third Amended Complaint,

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- a. identify with specificity each instance of harassment you intend to rely upon at the trial of this matter, providing as to each instance so identified, the time, date and place of the harassment;
- b. identify the full name(s) and present address(es) of each and every person you claim to have knowledge of each instance of harassment, stating as to each such person the source and substance of his or her knowledge; and
- c. identify each and every document which would tend to support your allegation(s) of harassment.

8. As to each instance of your being followed and/or surveilled as is alleged in Paragraph 26 of your Third Amended Complaint,

- a. identify with specificity each instance of following and/or surveillance you intend to rely upon at the trial of this matter, providing as to each instance so identified, the time, date and place of the following and/or surveillance;
- b. identify the full name(s) and present address(es) of each and every person you claim to have knowledge of each instance of following and/or surveillance stating as to each such person the source and substance of his or her knowledge; and
- c. Identify each and every document which you intend to rely upon at the trial of this matter to support your allegation(s) of following and/or surveillance.

1 9. As to each instance of your being pushed and/or
2 assaulted as is alleged in Paragraph 26 of your Third Amended
3 Complaint,

4 a. identify with specificity each instance of pushing and/
5 or assault you intend to rely upon at the trial of
6 this matter, providing as to each instance so
7 identified, the time, date and place of the pushing
8 and/or assault;

9 b. identify the full name(s) and present address(es) of
10 each and every person you claim to have knowledge of
11 each instance of pushing and/or assault, stating as to
12 each such person the source and substance of his or
13 her knowledge; and

14 c. identify each and every document which would tend
15 to support your allegation(s) of pushing and/or
16 assault.

17 10. As to each instance in which you allege a contract to
18 which you were a party was breached, as is alleged in
19 Paragraphs 37 through 42 and Paragraphs 45 through 48 of your
20 Third Amended Complaint,

21 a) identify each and every contract by providing complete
22 details as to the parties to said contracts, the date
23 and place where the contracts were made, and the terms
24 of and consideration for each such contract;

25 b) state each and every action (or restraint of action)
26 which you performed pursuant to each alleged contract;

27 c) identify each and every person who has knowledge of
28 your allegations of breaches of contract;

1 d) identify each and every document which would tend
2 to support your allegations of contracts breached by
3 or interfered with by cross-defendants.

4 11. As to each and every instance not previously
5 described by you in your answers to Interrogatories 3, 6, 7, 8,
6 9, and 10 above, in which you claim the "Fair Game Doctrine" was
7 applied against you,

8 a) identify with specificity each and every instance of
9 the application of the "Fair Game Doctrine," providing
10 as to each such instance the date or dates, location or
11 locations and the full name(s) and address(es) of the
12 person(s) involved in each instance;

13 b) identify each and every person who has knowledge of
14 each such instance, stating as to each person so
15 identified the basis for and content of his or her
16 knowledge; and

17 c) identify each and every document which would
18 tend to support your allegation(s) that the "Fair Game
19 Doctrine" was applied against you.

20 12. Identify any and all goods and/or services you
21 received from the Church of Scientology, for which you paid
22 money, during the time you were a member of the Church of
23 Scientology, providing as to each such itemized goods or
24 service the specific amount you claim to have paid and the
25 true value you now assign to each.

26 13. Identify and itemize any and all goods and/or
27 services you received from the Church of Scientology for which
28 you did not pay money during the time you were a member of

1 the Church of Scientology, providing as to each such itemized
2 goods and services the true value you now assign to each.

3 14. If you ever, during the time you were a member of the
4 Sea Organization, specifically, or the Church of Scientology,
5 generally, expressed a desire, whether in writing or orally, to
6 return to college or take educational courses or otherwise
7 continue your formal education, state when, where, to whom, the
8 specific content, and result of each such expression.

9 15. Describe in detail all of your specific duties as
10 head or "bosun" of the Rehabilitation Project Force, including
11 in your answer the dates and places those duties were performed.

12 16. Describe in detail the specific benefits you
13 personally hoped to achieve or gain through Scientology, during
14 the period in which you were a member of the Church of
15 Scientology, stating as to each such benefit so described
16 whether you in fact did achieve or gain it.

17 17. Describe in detail the specific benefits you
18 personally hoped to achieve or gain through auditing, during
19 the period in which you were a member of the Church of
20 Scientology, stating as to each such benefit so described
21 whether you in fact did achieve or gain it.

22 18. If you claim to have suffered severe emotional shock,
23 trauma, mental anguish, fear, or anxiety, describe in detail
24 each and every symptom you suffered, the date(s) and place(s)
25 where each instance of said suffering occurred, all witnesses
26 to each instance of said suffering, and any and all steps you
27 took to alleviate each instance of said suffering.

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1 19. Describe in complete detail how and to what extent
2 your health, strength and activity were hurt and injured as is
3 alleged in Paragraph 28 of your Third Amended Complaint,
4 including in your answer the date(s) and place(s) of each such
5 injury, the names and addresses of each and every witness to
6 each claimed injury, and the specific identity of any and all
7 documents which you intend to rely upon to support each
8 specific claim of injury.

9 20. Describe in complete detail how and to what extent
10 you sustained shock and great emotional and psychological
11 distress as is alleged in Paragraph 28 of your Third Amended
12 Complaint, including in your answer the date(s) and place(s) of
13 each such injury, the names and addresses of each and every
14 witness to each claimed injury, and the specific identity of
15 any and all documents which you intend to rely upon to support
16 each specific claim of injury.

17 21. State whether you were informed, as is alleged in
18 Paragraph 28 of your Third Amended Complaint, that your
19 injuries as described more fully in Interrogatories number 18,
20 19 and 20 will result in some permanent disability to you,
21 including in your answer the identity of those person(s) who so
22 informed you and the date, place and circumstances of such
23 information and, if such information was conveyed to you in
24 writing, the identity of each and every document which so
25 informed you.

26 22. Have you ever sought any treatment for any of the
27 injuries alleged in Paragraph 28 of your Third Amended
28 Complaint? If your answer to this interrogatory is in the

1 affirmative, identify the person(s) or institution(s) from whom
2 you sought treatment, the date(s) and place(s) where such
3 treatment was sought, the full treatment prescribed, and
4 whether such treatment was beneficial to you.

5 23. What do you claim was the actual value of the time
6 and labor you had invested during the eleven years you worked
7 for the Church of Scientology, including in your answer an
8 itemized breakdown of the individual components of your
9 calculations.

10 24. What is the monetary value of what you actually
11 received, in terms of a) cash payments, b) food, c) lodging, d)
12 medical and dental care, e) travel benefits, f) religious
13 services, g) counselling, and h) education, during the eleven
14 years you were a member of the Church of Scientology.

15 25. Describe what part(s), if any, of the tech
16 (technology) that you learned during the time you were a member
17 of the Church of Scientology you still use at this time.

18 26. Identify each and every doctor, counsellor, therapist,
19 psychotherapist, psychiatrist, hospital and/or clinic by whom
20 you have been treated from 1960 to the present, providing as to
21 each the address, the date or dates of treatment, and the
22 ailment, illness or other cause for which you were treated.

23 27. Provide a complete chronological history of your
24 employment from the time you left the Church of Scientology to
25 the present, including in your answer the full name and
26 addresses of your employers, rates of pay including all
27 benefits provided, the identity of your immediate supervisors,
28

1 vacations taken, and a statement of the reason(s) you left each
2 job.

3 28. Provide a complete chronological history of your
4 education from 1960 to the present, including in your answer
5 the full name and address of any and all schools you attended
6 or at which you took courses, the reason you left each such
7 school, and the full name of the school counsellor or guidance
8 counsellor, if any, who provided you with educational
9 counselling at each school attended.

10 29. Identify each and every law enforcement official,
11 including, but not limited to, local police departments,
12 Federal Bureau of Investigation, Internal Revenue Service,
13 State Attorney Generals, and Assistant United States Attorneys,
14 whom you talked to about your experiences in or knowledge of
15 the Church of Scientology, including in your answer the date or
16 dates of each such conversations, your motivation or purpose in
17 each such conversation, and whether any part or portion of your
18 conversations were reduced to writing or were based upon prior
19 written statements made by you.

20 30. If you allege that any "Suppressive Person Declare
21 Gerry Armstrong" was shown by cross-defendant(s) to any third
22 persons other than yourself, or by agents or employees of
23 cross-defendant(s), identify each and every person who saw the
24 document, stating as to each such person the date or dates that
25 he or she was shown the document, by whom, and the
26 circumstances under which the document was exhibited.

27 31. Identify each and every expert witness you intend to
28 rely upon at the trial of this matter, providing as to each

1 expert witness so named:

- 2 a. a list of the witness' qualifications as an
3 expert;
4 b. a general summary of what you expect the substance of
5 his or her testimony at trial to be; and
6 c. the identity of any and all reports, notes, summaries
7 or other writings made by said witness, his agents,
8 servants or employees in preparation of rendering
9 testimony at the trial of this matter.

10 32. Identify any and all life insurance policies, whether
11 owned by you or not, in which you are the named insured,
12 stating as to each such policy, the date that it was secured,
13 the identity of the owner, the identity of the beneficiary or
14 beneficiaries, the face amount, and whether it is a whole life
15 or term policy.

16 33. If you claim you ever disagreed with your being
17 assigned to the Rehabilitation Project Force at or about the
18 time of said assignment(s), please state whether you requested
19 a committee of evidence ("comm. ev."), stating, if you did,
20 the basis for your request(s) and the findings and
21 recommendations of such committee(s).

22 DATED: October 2, 1986

23 PETERSON AND BRYNAN

24
25 By 
26 JOHN G. PETERSON

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF

I have read the foregoing _____ and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner _____ a _____ of _____

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document and know its contents. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for _____

a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I have read the foregoing document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

Executed on _____, 19____, at _____ California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT
(other than summons and complaint)

Received copy of document described as _____

on _____ 19____.

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of LOS ANGELES State of California.

I am over the age of 18 and not a party to the within action; my business address is: 8530 Wilshire Blvd. Beverly Hills, CA. 90211 Suite 407

On Oct. 2 1986 I served the foregoing document described as _____

Interrogatories to Cross-Complainant propounded by Cross-Defendant, Church of Scientology of California

_____ on see below

in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at: _____

addressed as follows:

Julia Dragojevic
CONTOS & BUNCH
5855 Topanga Canyon Blvd. Suite 400
Woodland Hills, CA. 91367

(BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail. Executed on _____, 19____, at _____ California.

(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee. Executed on Oct. 2 1986 at Los Angeles California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Signature